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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

ANA TERESA RIVERA, ET AL

CIVIL NO.: 16-2353 ( ADC )

Plaintiffs

V.

PUERTO RICO ELECTRIC POWER  
AUTHORITY, et al.

Defendants

RE:

TORTS

**OPPOSITION TO REQUEST FOR ENTRY OF DEFAULT AND REQUEST FOR A  
SEVEN DAY EXTENSION (UNTIL DECEMBER 16, 2016) TO ANSWER THE  
COMPLAINT**

TO THE HONORABLE COURT:

COMES NOW ACE Insurance Company of Puerto Rico (“ACE”), through the undersigned attorney, and respectfully states, alleges and prays as follows:

1. The appearing party was served with copy of the Summons and the Amended Complaint in this case. However, due to a clerical inadvertence at ACE, the service documents were not forwarded until today to the undersigned.
2. ACE hereby intends to defend itself, and has valid defenses in this case starting from the fact that its liability does not start until PREPA has paid the first two million dollars in indemnity for a covered claim.
3. In light of the above, and given in particular the inadvertent nature in timely appearing, ACE hereby opposes plaintiffs' request for the entry of default against ACE, and respectfully requests an extension of seven days to answer the complaint, to expire on December 16, 2016.

WHEREFORE it is respectfully requested from this Honorable Court that plaintiffs' motion for entry of default against ACE be denied, and that instead it be granted a seven day extension, to expire on December 16, 2016, to answer the complaint.

In San Juan, Puerto Rico, this 9<sup>th</sup> day of December, 2016.

I HEREBY CERTIFY that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: 1) David W. Román, Esq, and José Luis Ubarri, Esq., [doman@ubarri-romanlaw.com](mailto:doman@ubarri-romanlaw.com).

Respectfully submitted,

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